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THE HONORABLE JAMES L. ROBART

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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9 0912139 B.C., LTD., a Canadian
corporation, and PAKAGE APPAREL,
10 INC., a Canadian corporation,

11 Plaintiffs,

12 v.

13 RAMPION USA INC., a Washington
corporation, and RAMPION
14 ENTERPRISES LTD., a Canadian
corporation,

15 Defendants.

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17 Pursuant to LCR 7(d)(1) and 10(g), Plaintiffs and Defendants, by and through their
18 counsel of record, hereby stipulate and jointly move the Court for entry of an order extending the
19 deadline to re-open the case pending the consummation of the formal settlement agreement.

20 On September 5, 2019, in response to a notice that the parties had reached a settlement in
21 principle, the Court entered an Order (Dkt. # 67) striking all case deadlines and dismissing this
22 case, subject to re-opening at the motion of any party by November 4, 2019, if the parties were
23 unable to consummate their settlement agreement by that time. The parties now jointly move the
24 Court to extend the November 4, 2019 deadline to re-open this case to November 13, 2019.

25 Good cause exists for the proposed extension. The parties signed a September 5, 2019
26 binding settlement term sheet prior to the provisional dismissal of this case. Since then, the

JOINT MOTION TO EXTEND DEADLINE TO RE-OPEN CASE PENDING SETTLEMENT - 1
(2:18-cv-01464-JLR)

104142105.2 0068561-00001


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1 parties have exchanged multiple drafts of formal settlement documents and have diligently
2 continued to negotiate the detailed terms. As of today, a small number of issues concerning the
3 terms and language of the formal settlement documents remain unresolved between the parties.
4 The parties' binding settlement term sheet was negotiated with the assistance of mediator Lou
5 Peterson and provides that in the event of any disagreement as to the meaning of the terms set
6 forth in the term sheet or in preparation of more formal documentation, the parties agree that Mr.
7 Peterson will resolve any such disagreement. As such, the parties are confident that they will
8 have a final, executed set of formal settlement documents before the additional requested time
9 expires.

10 Given the current status of negotiations, however, it appears the parties need a few extra
11 days beyond November 4, 2019 to finalize and execute the formal settlement documents. As a
12 result, the parties hereby request a short extension of the deadline to re-open this case from
13 November 4, 2019 to November 13, 2019.

14 DATED: October 29, 2019.

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16 /s/ Brian C. Park

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19 Attorneys for Plaintiffs

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JOINT MOTION TO EXTEND DEADLINE TO RE-OPEN CASE PENDING SETTLEMENT - 2
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21 Attorneys for Defendants

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ORDER

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It is so ordered.

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Dated this 20 day of October, 2019.

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THE HONORABLE JAMES L. ROBART
United States District Judge

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JOINT MOTION TO EXTEND DEADLINE TO RE-OPEN CASE PENDING SETTLEMENT - 3
(2:18-cv-01464-JLR)

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